

**THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: : **BK. No. 19-11274 JKF**
RAFHIA ROSE FOSTER :
Debtor : **Chapter No. 13**

**HSBC BANK USA, N.A., AS TRUSTEE FOR
THE REGISTERED HOLDERS OF NOMURA
HOME EQUITY LOAN, INC., ASSET-
BACKED, CERTIFICATES, SERIES 2006-HE3**
Movant

v.

RAFHIA ROSE FOSTER
Respondent

**NOTICE OF COVID-19 MORTGAGE FORBEARANCE AGREEMENT PURSUANT TO
LOCAL ORDER 20-3007**

The undersigned, Phelan Hallinan Diamond & Jones, LLP, are creditor's counsel in this matter.

1. Debtor currently has a mortgage with **PHH MORTGAGE CORPORATION**. The property address is 1226 ATWOOD ROAD, PHILADELPHIA, PA 19151, Loan # ending in 1748. A Proof of Claim has been filed on the claim register at # 1. A written Notice of Payment Change/Forbearance is being filed on the claims docket pursuant to bankruptcy Rule 3002.1 (b) and Local Rule 20-3007.
2. The terms of the forbearance are as follows: Regular monthly mortgage payments starting with the April 24, 2020 through July 23, 2020 are suspended. Payment of the escrow component of the regular monthly mortgage payments shall also be suspended
3. The Creditor advises that no fees will be assessed against the loan with regard to this Notice of Forbearance.

4. Prior to the expiration of the forbearance period, Debtor must either (1) request additional forbearance time under Local Rule, State or Federal Law; (2) enter into loss mitigation with Creditor; or (3) file an Amended Chapter 13 Plan which cures the arrears resulting from the forbearance period over the remainder of the Chapter 13 Plan.
5. Creditor, does not waive any rights to collect the payments that come due during the forbearance period or any payments that were due and owing prior to the forbearance period. The payment post-petition amount due at the time of this forbearance is \$644.27.
6. Creditor does not waive its rights under the terms of the note and mortgage or under other applicable non-bankruptcy laws and regulations, including, but not limited to, RESPA, and the right to collect on any post-petition escrow shortage.

/s/ Jerome Blank, Esquire

Jerome Blank, Esq., Id. No.49736

Phelan Hallinan Diamond & Jones, LLP

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May 15, 2020

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CERTIFICATE OF SERVICE

I hereby certify that service upon all interested parties, indicated below was made by sending true and correct copies of the Notice of Forbearance by electronic means on May 18, 2020.

SCOTT F. WATERMAN (Chapter 13)
Chapter 13 Trustee
2901 St. Lawrence Ave.
Suite 100
Reading, PA 19606

Rafhia Rose Foster
1226 Atwood Road
Philadelphia, PA 19151

BRAD J. SADEK
Sadek and Cooper
1315 Walnut Street
Suite 502
Philadelphia, PA 19107

U.S. Trustee
United States Trustee
Office of the U.S. Trustee
200 Chestnut Street
Suite 502
Philadelphia, PA 19106

May 18, 2020

/s/ Jerome Blank, Esquire

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